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February 2, 2005

**ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals, 445 12th Street, S.W.
Washington, D.C. 20554

Re: IB Docket No. 00-248
*Ex Parte*

Dear Ms. Dortch:

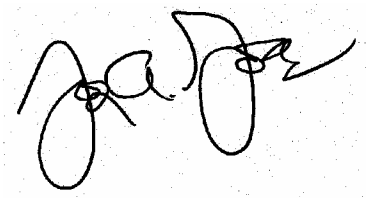
On February 1, 2005, the following persons met with International Bureau representatives Rod Porter, Thomas Tycz, Fern Jarmulnek, John Martin, Robert Nelson, Scott Kotler, and Steven Spaeth: David Cavossa of the Satellite Industry Association; the undersigned, representing PanAmSat Corporation ("PanAmSat"); Kalpak Gude, Jose Albuquerque, and Harry Ng (via telephone) of PanAmSat; Jaime Londono of SES Americom, Inc.; Steve Doiron of Hughes Network Systems, Inc.; Angela Maimo of Intelsat, Ltd.; Audrey Allison of The Boeing Company ("Boeing"); and Carlos Nalda of Steptoe & Johnson, representing Boeing.

The parties expressed their continued support for the proposals made by the Satellite Industry Association ("SIA"), of which they are members, in the above-referenced proceeding. They summarized certain elements of the proposals, along the lines shown in an attachment to this letter. They stressed that the SIA proposals are consistent with the Commission's goal of streamlining earth station processing, because they enlarge the class of earth station applications that can be processed routinely. They

reiterated their concerns with the potential for non-routine earth stations to cause adjacent satellite interference, and urged that the proponents of non-routine Ku-band stations for which "ALSAT" authority is sought be required to demonstrate how they proposed to maintain antenna pointing within the requisite tolerance. Finally, the parties asked that, if the Commission applies new restrictions to multiple access techniques employing contention protocols, something that SIA has opposed, then it take into account the impact that those restrictions would have on the installed base of equipment and that it consider grandfathering equipment that pre-dates the new requirements.

Please direct any questions concerning this filing to the undersigned.

Sincerely,



Joseph A. Godles
Attorney for PanAmSat Corporation

Attachment
cc: Rod Porter
Thomas Tycz
Fern Jarmulnek
John Martin
Robert Nelson
Scott Kotler
Steven Spaeth

**ATTACHMENT**

**1. Licensing of Ku-Band Antennas**

- In order to be routinely licensed small Ku-band antennas only would need to begin complying with the Section 25.209 antenna gain pattern at off-axis angles of 1.5° instead of the current 1.25°;

- Small Ku-band antennas that begin to comply with the Section 25.209 antenna gain pattern at off-axis angles of greater than 1.5° and up to 1.8° also would be approved on an ALSAT basis if the applicants demonstrated they could achieve pointing within a specified tolerance, and on an orbital location specific basis if the applicants demonstrated that their services had been coordinated with adjacent satellite operators.

**2. Licensing of C-Band Antennas**

- Small C-band antennas of at least 2.4m would be routinely processed if the power density at the antenna input did not exceed a specified density value and if the antennas were capable of maintaining a specified pointing tolerance.

**3. Reduction of Power to Meet Off-Axis EIRP Standard for Routine Licensed Antennas**

- In the case of non-conforming transmit earth station antennas in the C-band and the Ku-band having sidelobe levels exceeding the 29-25log(theta) standard, it is theoretically possible to bring the off-axis EIRP spectral density towards the adjacent satellite into compliance with the standard by reducing the transmit input power density. Absent coordination with adjacent satellite operators, however, SIA opposes licensing C-band and Ku-band FSS antennas on the basis of power density reduction.

**4. Receive Antenna Patterns Should Not Be Considered to Determine Whether an Earth Station Is Eligible for Routine Licensing**

- All receive-only antennas will be routinely processed regardless of the gain pattern of the antenna and will be protected from interference in accordance with section 25.209(c). All transmit/receive antennas will be routinely processed based on the transmit portion of the antenna only and will be protected from interference in accordance with section 25.209(c).